Record of Phone Conversation Between FAA and AOPA, Aug. 6, 2004

AOPO submitted the following comment to the docket:

"**91.205:** AOPA objects to the FAA's proposal to reduce the altitude at which Distance Measuring Equipment (DME) is required. Contrary to the FAA's statements on page 77337 of the Federal Register (Vol 67, No. 242 / Tuesday, December 17, 2002) this proposed change would impose an obligation to change (or suipplement) current navigation systems on certain aircraft and the proposed changes *would* impose costs."

On August 6, 2004 Carole Gaelick and Dave Catey called Randy Kenagy to clarify the comment.

Question: Can you be specific as to what and how many aircraft are not equipped with DME and would operate above FL 180?

Answer: According to the FAA General Avionics equipment survey, 75,800 GA aircraft are equipped with DME[1]. This is only about 36% of the total GA population. There are likely to be aircraft operating below 240 FL and above 180 FL that may not have DME. (He doesn't know how many there are.)

General aviation aircraft are powered by piston engines and can't climb above 180 FL unless they have a turbocharged system. Pilots would choose to operate below 180 FL if they had no true operational need. However, in the middle of a peak thunderstorm (where the icing is likely to be) the ability to climb above 180 FL gives them a tool to avoid safety weather hazards.

Almost all aircraft with turbocharged engines are certified to operate above 180 FL and below 240 FL.

Question: Does AOPA have any information on the number of aircraft capable of operating at or above FL 180 that are equipped with a suitable RNAV system?

Answer: AOPA does not have any data regarding such equipage.

[1] There are a total of 211,000 general aviation aircraft.